

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBITS ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibits A – E, and Defendants, Johnson & Johnson, Ethicon, Inc. and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A
(Aylstock Witkin Kreis & Overholt)

<u>Civil Action No.</u>	<u>Case Style</u>
2:13-cv-32515	Michelle Eberhart and Gary Eberhart v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:16-cv-07719	Sandra Crowson v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT B
(Chaffin Luhana)

Civil Action No.	Case Style
2:13-cv-15145	Cynthia Korsgaard and Steven J. Korsgaard v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-09258	Brigid K. Miklovic and Thomas Miklovic v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-06565	Deborah G. Salem v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:12-cv-06590	Lisa Lehrman-Bon and Roger Lehrman-Bon v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson

EXHIBIT C
(The Law Offices of Ben C. Martin)

<u>Civil Action No.</u>	<u>Case Style</u>
2:15-cv-13560	Stephanie H. Smith and Benjamin T. Smith v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT D
(The Whitehead Law Firm)

<u>Civil Action No.</u>	<u>Case Style</u>
2:14-cv-28102	Norma L. McConnell v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-12328	Tannia Fournet and Mike Fournet v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT E
(Tom Rhodes Law Firm)

<u>Civil Action No.</u>	<u>Case Style</u>
2:13-cv-20441	Nicholle Winters and Johnny Winters v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson